

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Daouda M. Kane

Case No. 2:24-mj-590

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 18, 2024 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:

Code Section

Offense Description

18 U.S.C. § 1073(1)

Interstate flight to avoid prosecution

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.


Complainant's signature

Bryan Lacy, Special Agent, FBI



Printed name and title

Sworn to before me and signed in my presence.

Via Telephone

Date: December 19, 2024

City and state: Columbus, OH


Elizabeth A. Preston Deavers
United States Magistrate Judge


AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Bryan Lacy, being first duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of a criminal complaint against DAOUDA MAMOUDOU KANE (hereinafter KANE) for violations of Title 18 U.S.C. § 1073(1), unlawful flight to avoid prosecution for a felony under the laws of Ohio.

2. I am a Special Agent (SA) of the Federal Bureau of Investigation and am currently assigned to the Columbus Resident Agency in Columbus, Ohio. I have been employed by the FBI as a SA since March 2010. Since that time, I have been assigned as a case agent on a variety of federal criminal investigations and have obtained and executed federal search and arrest warrants on numerous occasions.

3. The statements in this affidavit are based on my personal investigation, training and experience, and information obtained by other agents, law enforcement officers, and witnesses. Because this affidavit is submitted for the limited purposes of securing an arrest warrant, I have not included every fact known to me concerning this investigation.

4. On February 2, 2024, KANE was formally charged by indictment in Franklin County Court of Common Pleas, Columbus, Ohio with four counts of felony rape, in violation of Ohio Revised Code 2907.02, punishable by a prison term or term of life imprisonment. The charges stem from an incident January 25, 2024 in Reynoldsburg, Ohio in which allegations were made that KANE had raped a child, age 5, on multiple occasions.

5. On February 7, 2024, an arraignment hearing was held with KANE in Franklin County Court of Common Pleas. At the hearing, KANE pleaded 'not guilty' to the four counts of rape as charged. KANE was held at the Franklin County jail until his release February 26, 2024

on a \$200,000 surety bond. KANE provided his address of 148 N. Yearling Rd., Whitehall, OH 43213.

6. KANE's trial in Franklin County Common Pleas Court was initially scheduled for February 29, 2024. Over a period of eight months, approximately eight continuance orders were filed with the final trial date scheduled for November 18, 2024. On November 18, 2024, KANE did not appear in court as ordered and a capias was filed by a Franklin County Judge for failure to appear at his state trial.

7. On December 8, 2024, FBI Mexico legal attaché office received information that KANE was in Tijuana, Mexico. KANE went to a shelter in Tijuana with a Mexican woman and asked that the Imam marry them. The shelter workers asked KANE why he was residing in Tijuana. KANE said that he no longer liked the U.S. and that he left a wife and daughter in the states. This caused the shelter to do some research on KANE where they found articles regarding his charges. The reporting party was shown a picture of KANE and confirmed that was him. The information about KANE's whereabouts was reported to the United States Consulate, who contacted the FBI.

8. Based on the foregoing, your affiant submits that there is probable cause to

believe KANE, did knowingly move or travel in interstate or foreign commerce with the intent to avoid prosecution, in violation of Title 18 U.S.C. § 1073(1).



Bryan Lacy
Special Agent
Federal Bureau of Investigation

SUBSCRIBED TO AND SWORN
before me on this 19th day of December, 2024


Elizabeth A. Preston Deavers
United States Magistrate Judge